

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:
All Tennessee Actions Against The
St. Thomas Entities

MDL No. 2419
Master Docket No.: 1:13-md-2419-RWZ

Honorable Rya W. Zobel

DEMAND FOR JURY TRIAL

**PLAINTIFFS' STEERING COMMITTEES' MOTION FOR LEAVE TO FILE
EXHIBITS UNDER SEAL**

The Plaintiffs' Steering Committee (the "PSC") moves this Honorable Court, pursuant to Local Rule 7.2, to allow Exhibits B and C to the Memorandum in Support of the Plaintiffs' Steering Committee's Motion to Compel the Saint Thomas Entities to Respond to Produce Certain Documents, to be filed under seal.

These two exhibits, containing deposition testimony of Rebecca Climer and Cindy Williams respectively, have been designated as Confidential pursuant to this Court's Protective Order No. 3 (Dkt. 814) by the Saint Thomas Entities.

WHEREFORE, the PSC respectfully requests that the Court allow the Exhibits to the Memorandum in Support of the PSC's Motion to Compel be filed under seal.

September 17, 2015

Respectfully submitted,

s/ Benjamin A. Gastel

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Benjamin A. Gastel

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, Benjamin A. Gastel, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Date: September 17, 2015

/s Benjamin A. Gastel

Benjamin A. Gastel